

Message

---

**From:** Lisa Rector [lrector@nescaum.org]  
**Sent:** 7/12/2020 4:47:44 PM  
**To:** Toney, Mike [Toney.Mike@epa.gov]; Johnson, Steffan [johnson.steffan@epa.gov]  
**Subject:** ADI WDS 109  
**Attachments:** adi\_WDS-109.pdf

Stef and/or Mike, is WDS 109 still in effect? I thought all AD's under the 1988 rule were no longer in effect. This ADI states that only one run must be completed at the fully closed position regardless of the burn rate achieved. Any light you can shed on this topic would be greatly appreciated. Thanks!



**Lisa Rector**, Policy and Program Director at **NESCAUM**

89 South Street, Suite 602, Boston, Massachusetts, 02111 | 802.899.5306 | 617.259.2095 | Fax: 617.742.9162  
| [lrector@nescaum.org](mailto:lrector@nescaum.org)